

ROUX MEMORANDUM

TO: Mike Cirian, USEPA
FROM: Michael Ritorto, Roux Associates
CC: John Stroiazzo, Glencore
Steve Wright, CFAC
Lisa DeWitt, MDEQ
Andrew Baris, Roux Associates
DATE: April 25, 2017
RE: Minutes for Project Update Meetings – April 18/19, 2017
CFAC Remedial Investigation / Feasibility Study
Columbia Falls, Montana

A project update meeting was held on Tuesday, April 18, 2017 at the CFAC facility (2000 Aluminum Drive, Columbia Falls, MT) from approximately 9am to 4pm MT. The following individuals attended all or portions of the meeting as indicated below:

- Mike Cirian – USEPA (entire meeting)
- Lisa DeWitt – MDEQ (portion of meeting)
- John Stroiazzo – Glencore (entire meeting)
- Steve Wright – CFAC (entire meeting)
- Andrew Baris – Roux Associates (entire meeting)
- Michael Ritorto – Roux Associates (entire meeting)
- Laura Jensen – Roux Associates (entire meeting)
- Gunnar Emilsson – CDM Smith (entire meeting)
- Erin Formanek - CDM Smith (via teleconference, portion of meeting)
- Sean Coan – CDM Smith (via teleconference, portion of meeting)
- Robert Moler – USEPA (portion of meeting)

The meeting agenda included the following items:

- The group reviewed and discussed written comments provided by Aluminum City resident Nino Berube and USEPA's written response to Nino's comments prepared by CDM Smith.
- The group reviewed and discussed written comments provided by USEPA and MDEQ to CFAC on the draft Phase I Site Characterization Data Summary Report dated February 27, 2017.

The project update meeting continued Wednesday, April 19, 2017 at the CFAC facility from approximately 9am to 4pm MT. The following individuals attended all or portions of the meeting:

- Mike Cirian – USEPA (entire Meeting)
- Brian Sanchez – USEPA (entire Meeting)
- John Stroiazzo – Glencore (entire Meeting)
- Steve Wright – CFAC (entire Meeting)
- Andrew Baris – Roux Associates (entire Meeting)
- Michael Ritorto – Roux Associates (entire Meeting)
- Laura Jensen – Roux Associates (entire Meeting)
- Tom Biskey – EHS Support (portion of Meeting)
- Gunnar Emilsson – CDM Smith (entire Meeting)
- Steve Michalanko – Roux Associates (via teleconference, portion of meeting)
- Erin Formanek – CDM Smith (via teleconference, portion of meeting)
- Mary Green – Ann Green Communications (portion of meeting)

The meeting agenda included the following items:

- The group reviewed and discussed written comments provided by USEPA to CFAC on the draft Screening Level Ecological Risk Assessment (SLERA) Summary Report dated February 27, 2017.
- The group discussed conceptual path forward for the Baseline Human Health and Ecological Risk Assessment.
- The group discussed schedule, deliverables, and milestones planned for 2017 and beyond.
- A Site tour was conducted by Roux Associates – Various Site features were visited.
- The group discussed preparation for the Community Liaison Panel / Public Meeting and presentation of the Phase I Data Summary Report Results to the public.

Meeting Highlights and Paths Forward

- Comments from Nino Berube have been considered by all parties. CFAC/Roux provided feedback to USEPA on Nino's comments following the group discussion. Mike Cirian from USEPA will follow-up and respond to Nino as USEPA deems appropriate.
- All comments on the draft Phase I Data Summary Report were discussed during the meeting. CFAC/Roux will continue to review the comments and will prepare a written response to each comment by May 26, 2017. CFAC/Roux will revise the Phase I Data Summary Report for re-submittal to the USEPA by June 16, 2017.

- Comments from USEPA on the SLERA Summary Report were discussed during the meeting. Comments from MDEQ on the SLERA were not discussed during the meeting because CFAC/Roux received MDEQ comments shortly before the meeting (i.e., Monday, April 17). CFAC/Roux will continue to review all comments on the SLERA and will prepare a written response to each comment by May 26, 2017. CFAC/Roux will revise the SLERA Summary Report for re-submittal to USEPA by June 16, 2017.
- The group agreed that a project conference call will be held on Tuesday, May 30, 2017 to discuss the CFAC/Roux's response to comments prior to finalization of the Phase I Data Summary Report.
- The group discussed the path forward for 2017, including the following major tasks:
 - CFAC/Roux will submit two sampling modification forms to USEPA requesting concurrence on the proposed asbestos landfill sampling and pneumatic slug testing Scopes of Work planned for summer 2017
 - CFAC/Roux will prepare a Baseline Human Health Risk Assessment Work Plan (BHHRA WP) and a Baseline Ecological Risk Assessment Work Plan (BERA WP) to be submitted to USEPA following approval of the Phase 1 Data Summary Report and SLERA; and following completion of Round 4 groundwater and surface water sampling (Submittal date for both Work Plans is estimated in October 2017)
 - CFAC /Roux will prepare a Groundwater and Surface Water Data Summary Report, which will include results and analysis of the four rounds of groundwater and surface water sampling (Submittal date is estimated in September 2017).
 - CFAC/Roux will utilize the results from the Phase I Site Characterization and information in the BHHRA WP and BERA WP to develop a Scope of Work for the Phase II Site Characterization. The Scope of Work will be summarized in a Phase II Sampling and Analysis Plan (Phase II SAP), to be submitted at the end of 2017.
- The group discussed that the next public meeting will be scheduled for early November, 2017. The public meeting will review the results of the four rounds of sampling, the risk assessment work plans, and the path forward for the project.
- An updated project schedule outlining the key dates that were agreed upon during the meeting is provided as an attachment to these minutes.

-----End of Minutes for Project Update Meeting-----